

EXHIBIT A
KAUFMANN DEPOSITION

1 that have been lost or abandoned in coral reef
2 environments for anywhere from a few days to
3 many decades or centuries underwater.

4 A Uh-huh.

5 Q Are you talking about there -- as you're
6 in the field you're looking at those items?

7 A Correct.

8 Q Okay. This has included a good deal of
9 military and aeronautical debris. What
10 does -- what does that mean?

11 A I had a project at Johnston Atoll which is
12 800 miles southwest of Honolulu. It is a
13 military base. There's an enormous amount of
14 material that was lost there and much of it we
15 had to map and steer clear of because it was
16 dangerous. Some of it was of historic interest
17 and that's what we did when we were taking a
18 break.

19 Q And so you were diving, I take it, and
20 looking at this stuff and iden -- identifying
21 it.

22 A Yes. We -- we located some using
23 magnetometers and side scan sonar and then we
24 just drove in it for fun or to know where to

1 there were so few objects sufficiently
2 remarkable to suggest that there should have
3 been a much more detailed analysis.

4 Q And do you know what TIGHAR did with the
5 2010 video when they had it in their
6 possession?

7 A I certainly don't know everything they
8 did. One thing they did is show it to me and
9 that's all I really know.

10 Q Okay. Do you know to what extent they
11 analyzed that video?

12 A No, I do not. No.

13 MR. OVEN: I don't have anything further.
14 Thank you.

15 THE DEPONENT: That was easy.

16 MR. MASTERSON: Well, you're not done yet.

17 THE DEPONENT: Oh, oh, oh.

18

19 CROSS-EXAMINATION

20 BY MR. MASTERSON:

21 Q Dr. KaufmanN, if you had a magic wand and
22 could do anything you wanted, what would you do
23 to conclusively determine if those photos
24 depict Earhart wreckage?

1 investigation, it was an excellent approach.
2 By itself, it does not provide sufficient
3 evidence to conclude that it's aircraft parts.

4 Q You've been to -- in 2009 and have
5 you -- have you been on the island itself?

6 A Yes.

7 Q And it sounds like a lot of time spent in
8 the water around it.

9 A More time spent in the water but I spent
10 several hours on the island.

11 Q Can you describe the environment in terms
12 of -- let me use the generic term trash and
13 other manmade materials?

14 A Oh, that was kind of amusing. Of course,
15 we had -- well, we had two objectives on the
16 island. I was suppose to be looking at birds,
17 but I was really looking for Japanese fishing
18 glass floats because we prize those, and then I
19 was walking the beach which is hard to walk on
20 because it's all cobbles, looking for stuff
21 Earhart might have dropped and, I mean, the
22 truth will out. And the thing that astonished
23 me is how difficult I thought it would be to
24 identify anything from any particular person

1 because there's so much garbage everywhere.
2 There's an enormous amount of trash on the
3 beach.

4 Q And, just for purposes of those of us who
5 haven't been there understanding, what kind of
6 things would you see?

7 A Well, there's a lot of derelict fishing
8 gear but then there is also just odd pieces of
9 flip flops and, I mean, this is actually
10 well-characterized, the -- the -- the rubber
11 and polymer trash of the ocean is mostly things
12 that fall off -- we think they're falling off
13 container ships.

14 I didn't see any rubber ducks, I was
15 disappointed by that, but definitely a lot of
16 shoe stuff and, like, I don't remember bra
17 straps but that kind of thing.

18 Q I have to ask you about rubber ducks.
19 I -- I remember -- I remember reading an
20 article about a container full of rubber ducks.

21 A Yes, that's why I was disappointed. I
22 really wanted one of those rubber ducks.

23 Q And that was -- that was a whole bunch --

24 MR. OVEN: It's on ebay.